1 2 3 4 5 6 Hon. Richard A. Jones 7 8 9 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 10 JENNIFER and EUGENE WONG, for themselves 11 and as parents of Student JW, a minor, No. C16-1774 RAJ 12 Plaintiffs, STIPULATED MOTION TO CONTINUE DEADLINE FOR PROPOSED FINDINGS 13 OF FACT AND CONCLUSIONS OF v. 14 LAW SEATTLE SCHOOL DISTRICT NO. 1, 15 **NOTE ON MOTION CALENDAR:** December 4, 2018 Defendant. 16 17 Plaintiffs and Defendant, through their undersigned attorneys, move the Court for an 18 order to continue the deadline for filing proposed findings of fact and conclusions of law as 19 follows: 20 The Court's docket entry of October 31, 2018 (Dkt. No. 76) instructed the parties 1. 21 to submit proposed findings of fact and conclusions of law by December 14, 2018. 22 2. On November 30, 2018, David Hokit, counsel for Defendant, underwent an 23 unexpected surgery and is expected to be on medical leave until the week of December 10, 2018. 24 25 CURRAN LAW FIRM P.S.

STIPULATED MOTION TO CONTINUE DEADLINE FOR PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (C16-1774 RAJ) - 1 CURKAN LAW FIRM P.S 555 West Smith Street Post Office Box 140 Kent, Washington 98035-0140 (T) 253 852 2345 / (F) 253 859 8037

1	3. Mr. Hokit notified Plaintiffs' cor	unsel of his surgery and medical leave on
2	November 29, 2018. Counsel for both parties co	onferred and agree to extend the deadline for
3	submitting proposed findings of fact and conclusion	ns of law one week to December 21, 2018.
4	4. This Stipulation and request for con	tinuance is made according to LCR 10(g).
5	5. A proposed Stipulated Order to Co.	ntinue Deadline for Proposed Findings of Fact
6	and Conclusions of Law accompanies this motion.	
7	Dated this 4th day of December, 2018.	
8		CURRAN LAW FIRM, P.S.
10		D //D :1T II 1'
11		By: /s/ David T. Hokit David Hokit, WSBA #13512
12		555 West Smith Street P.O. Box 140
13		Kent, WA 98035 Telephone: (253) 852-2345
14		dhokit@curranfirm.com Attorneys for Defendant
15		
16		CURRAN LAW FIRM, P.S.
17		By: /s/ Sam Chalfant
18		Sam Chalfant, WSBA #46080 555 West Smith Street
19		P.O. Box 140 Kent, WA 98035
20		Telephone: (253) 852-2345 schalfant@curranfirm.com
21		Attorneys for Defendant
22		SHAW LAW GROUP, PLLC
23		DILLY DAY GROOT, I DEC
24		By: /s/ Bridget Bourgette Shaw
25		Bridget Bourgette Shaw, WSBA #28850

STIPULATED MOTION TO CONTINUE DEADLINE FOR PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (C16-1774 RAJ) - 2 CURRAN LAW FIRM P.S. 555 West Smith Street Post Office Box 140 Kent, Washington 98035-0140 (T) 253 852 2345 / (F) 253 859 8037

Case 2:16-cv-01774-RAJ Document 79 Filed 12/04/18 Page 3 of 4

1 2 3	323 1st Avenue West Seattle, WA 98119 Telephone: (206) 623-1225 Facsimile: (206) 284-2245 Email: bridget@shawlawgrouppllc.com
4	Attorney for Plaintiffs
5	HENRY & DEGRAAFF, PS
6	
7	By: /s/ Christine L. Henry Christine L. Henry, WSBA #31273
8	150 Nickerson St., Suite 311 Seattle, WA 98109
10	Telephone: (206) 330-0595 Facsimile: (206) 400-7609 Email: chenry@hdm-legal.com
11	Attorney for Plaintiffs
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

STIPULATED MOTION TO CONTINUE DEADLINE FOR PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (C16-1774 RAJ) - 3 CURRAN LAW FIRM P.S. 555 West Smith Street Post Office Box 140 Kent, Washington 98035-0140 (T) 253 852 2345 / (F) 253 859 8037

1	CERTIFICATE OF SERVICE
2	I hereby certify that on the date listed below I electronically filed the foregoing with the
3	Clerk of the Court using the CM/ECF system that will send notification of such filing to the
4	following parties:
5	Bridget Bourgette Shaw
6	<u>bridget@shawlawgrouppllc.com</u> Attorney for Plaintiffs
7	Christina L. Henry
8	Henry & Degraaff, PS chenry@hdm-legal.com
9	Attorney for Plaintiffs
10	Dated this 4th day of December, 2018.
11	
12	CURRAN LAW FIRM, P.S.
13	By: /s/ Sam Chalfant
14	Sam Chalfant, WSBA #46080 555 West Smith Street
15	P.O. Box 140 Kent, WA 98035
l6 l7	Telephone: (253) 852-2345 schalfant@curranfirm.com
18	Attorneys for Defendant
19	
20	
21	
22	
23	
24	
25	

STIPULATED MOTION TO CONTINUE DEADLINE FOR PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (C16-1774 RAJ) - 4 CURRAN LAW FIRM P.S. 555 West Smith Street Post Office Box 140 Kent, Washington 98035-0140 (T) 253 852 2345 / (F) 253 859 8037